

REMARKS

Claim 1 calls for a reflecting layer, an absorbing layer over the reflecting layer, the absorbing layer preferentially absorbs blue light.

Nothing in any of the cited references in any way suggests that those references teach structures which preferentially absorb blue light, much less structures made up of silicon nitride and oxide in the indicated thicknesses. While Oyama does teach a windshield which has absorbing layers formed thereon, there is no suggestion that these layers are specifically adapted to preferentially absorb blue light.

As pointed out in the specification embodiment, in order to make the absorbing layer blue light absorbent, small grain sizes are achieved in the silicon nitride and oxide layers. For example, the small grain sizes may be achieved by depositing the layers at temperatures less than 250°C using chemical vapor deposition. No such technique (or any other) is anywhere suggested in the references that would form absorbing layers that preferentially absorb blue light.

Thus, there is no reason to conclude that the references, even if combined, would teach the preferential absorption of blue light. Certainly it is not inherent in the references since they need not necessarily have the claimed structure. Absent some teaching that they have it, there is no reason to presume that they preferentially absorb blue light when no such capability in the absorbing layers is anywhere suggested.

Therefore, claim 1 and its dependent claims should be in condition for allowance. For the same reason, claim 8 as amended should be in condition for allowance, as should its dependent claims. Likewise, claim 16 has been amended and as amended should be allowable for the same reasons.

Claim 25 was rejected over a combination that includes Jerman. The office action points to a line in column 17 and suggests that this line indicates that the metal layers may be deposited at a room temperature. However, in fact, what the sentence says is the following: "The metal layers may be deposited in a manner that minimizes their residual internal stress at room temperature." By conventional rules of grammar, "room temperature" does not refer to "deposited," but rather refers to the condition when internal stresses are reduced, namely room temperature operation. There is no suggestion within this language that the deposition itself should be done at room temperature.

Therefore, the requirement that the deposition occur at a temperature less than 50°C is nowhere suggested in any of the cited references and, therefore, claim 25 should patentably distinguish over the references.

In view of these remarks, the application should now be in condition for allowance.

Respectfully submitted,

Date: September 23, 2003



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